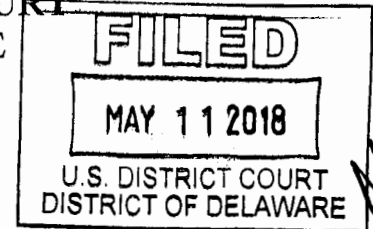


IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Wayne H. Thompson, Jr.



(In the space above enter the full name(s) of the plaintiff(s).)

-against-

Lawrence McDonald MD.

Civ. Action No. 18 - 715  
(To be assigned by Clerk's  
Office)

COMPLAINT

(Pro Se Prisoner)

Jury Demand?

☐ Yes

☒ No

(In the space above enter the full name(s) of the defendant(s).  
If you cannot fit the names of all of the defendants in the  
space provided, please write "see attached" in the space  
above and attach an additional sheet of paper with the full list  
of names. The names listed in the above caption must be  
identical to those contained in Section IV. Do not include  
addresses here.)

**NOTICE**

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

**Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.**

## I. COMPLAINT

Indicate below the federal legal basis for your claim, if known. This form is designed primarily for pro se prisoners challenging the constitutionality of their conditions of confinement, claims which are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

Check one:

- ☒ 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Action under *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971) (federal defendants)

## II. PLAINTIFF INFORMATION

Thompson Wayne H. n/a  
Name (Last, First, MI) Aliases

00183391  
Prisoner ID #

Sussex Correctional Institution  
Place of Detention

P.O. Box 500  
Institutional Address

(Sussex) Georgetown Delaware 19947  
County, City State Zip Code

## III. PRISONER STATUS

Indicate whether you are a prisoner or other confined person as follows:

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

#### IV. DEFENDANT(S) INFORMATION

*Please list the following information for each defendant. If the correct information is not provided, it could result in the delay or prevention of service. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.*

Defendant 1: McDonald, Lawrence MD.  
Name (Last, First)  
Doctor of Medicine (MD)  
Current Job Title  
23205 DuPont Boulevard  
Current Work Address  
(Sussex) Georgetown Delaware 19947  
County, City State Zip Code

Defendant 2: n/a  
Name (Last, First)  
n/a  
Current Job Title  
n/a  
Current Work Address  
n/a  
County, City State Zip Code

**Defendant(s) Continued**

Defendant 3:

n/a  
Name (Last, First)

n/a  
Current Job Title

n/a  
Current Work Address

n/a  
County, City

State

Zip Code

Defendant 4:

n/a  
Name (Last, First)

n/a  
Current Job Title

n/a  
Current Work Address

n/a  
County, City

State

Zip Code

## V. STATEMENT OF CLAIM

Place(s) of  
occurrence:

Sussex CORR. Inst. Pre-Trial Nurses Station

Date(s) of occurrence: April 2013 thru November 2013

State which of your federal constitutional or federal statutory rights have been violated:

Art. IV U.S. Constitution: "The rights of the people to be secure in their persons, houses, papers & effects against unreasonable searches/seizures shall not be violated"

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions, state whether you were physically injured as a result of those actions, and if so, state your injury and what medical attention was provided to you.

FACTS:

What  
happened to  
you?

I've suffered emotional knee-jerk reactions to the point of becoming mentally unsound & detached from my manhood due to my sexuality deceptively being imposed upon under the disguise of professionalism in the name of sexual self-gratification at the hands of Dr. Lawrence McDonald. At no time was I, Wayne H. Thompson, informed as to the nature and/or intent of his actions. Dr. Lawrence McDonald did, unnecessarily, fondle my testicles, manipulating my penis to erection and masturbating my maleness. I've become emotionally withdrawn, insecure in my masculinity and severely depressed. My morale and self-definement have been greatly affected and I continue to undergo periods of moodiness that constrain my expressions to the extent I'm no longer self-assured. Suspicion leads my thinking due to feelings of betrayal. The direct violation of my sexuality has left me in a state of disturbed confusion. I've submitted request forms seeking assistance from mental health and continue to receive no response.

Who did  
what?

Dr. Lawrence McDonald did violate my person by way of offensive touching and sexual abuse. In early 2013 I, Wayne H. Thompson, Jr. submitted a medical request in relation to a possible hernia. Between April & Nov. of 2013 I appeared before Dr. Lawrence McDonald in the Pre-Trial nurses station. Upon my arrival a greeting was extended and I was told to be seated. Believing my stay would be short I chose to stand. Dr. Lawrence McDonald then stated I remove my pants & boxers and lie on a table. He then put on a pair of gloves, fondle my testicles, then my penis until erection then commit the act masturbation upon my privacy. He then stated I pull my boxers & pants up and I'd be scheduled to see an outside doctor. At no time was I asked anything relating to a possible aperture in my sternum, ruptures or protrusions of my organs or tissues nor anything in reference to intestinal discomforts or my alimentary canal as a whole. Two months later I saw an outside doctor resulting in my first operation at BB Hospital in early March of 2014; 20 days later my hernia return. In late March of 2014 I was scheduled for my second operation at Wilm. Hospital; I never went. Instead, I was left to endure intestinal pains that went unaddressed for a year until I was transferred to the Delaware State Hospital, in March of 2015, for the purpose of competency. I stayed 17 months. Within this period I saw another doctor and was later sent to Wilm. Hospital for a second operation in late 2015. Eight days later my hernia returned and I was sent back to Wilm. Hospital on Feb. 3, 2016 for a third operation which revealed non-cancerous bacterial in my testicles. After this finding I was prescribed pericocets and in mid Feb. of 2016 I was returned to Wilm. Hospital for a fourth operation. My hernia was repaired, a testicle removed and pericocets prescribed.

Was anyone  
else  
involved?

No one else was involved!

**VI. ADMINISTRATIVE PROCEDURES**

*WARNING: Prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions. 42 U.S.C. § 1997e(a). Your case may be dismissed if you have not exhausted your administrative remedies.*

Is there a grievance procedure available at your institution? ☒ Yes ☐ No

Have you filed a grievance concerning the facts relating to this complaint? ☒ Yes ☐ No

If no, explain why not:

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Is the grievance process completed? ☒ Yes ☐ No

If no, explain why not:

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**VII. RELIEF**

*State briefly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.*

To be compensated for mental and emotional suffering in the form of three (3) million dollars

To be compensated for sexual abuse/violation in the form of five (5) million dollars



### VIII. PRISONER'S LITIGATION HISTORY

*The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in forma pauperis in federal court if that prisoner has "on three or more occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. §1915(g).*

Have you brought any other lawsuits in state or federal court while a prisoner?

☐ Yes

☒ No

If yes, how many?

0/A

Number each different lawsuit below and include the following:

- Name of case (including defendants' names), court, and docket number
- Nature of claim made
- How did it end? (For example, if it was dismissed, appealed, or is still pending, explain below.)

0/A

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**IX. PLAINTIFF'S DECLARATION AND WARNING**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; and (3) complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

*Plaintiff must sign and date the complaint and provide prison identification number and prison address.*

May 7, 2018  
Dated

Wayne H. Thompson, Jr.  
Plaintiff's Signature

Thompson Wayne H.  
Printed Name (Last, First, MI)

00183391  
Prison Identification #

Sussex Corr. Inst. P.O. Box 500 Georgetown Delaware 19947  
Prison Address City State Zip Code

**Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.**

